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NL-15-071

May 20, 2015

U.S. Nuclear Regulatory Commission
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SUBJECT: Response to Questions Raised at April 30, 2015 Government to
Government Meeting Regarding Natural Gas Pipelines Near Indian
Point Entergy Center
Indian Point Unit Numbers 2 and 3
Docket Nos. 50-247 and 50-286
License Nos. DPR-26 and DPR-64

Dear Sir or Madam:

On April 30, 2015, the Nuclear Regulatory Commission ("NRC") staff held a Government to Government Meeting in Cortlandt, New York in conjunction with the Federal Energy Regulatory Commission ("FERC"), the Pipeline and Hazardous Materials Safety Administration ("PHMSA"), and the Federal Emergency Management Agency ("FEMA"), regarding Spectra Energy's ("Spectra") Algonquin Incremental Market ("AIM") pipeline expansion project. During that meeting, local public officials posed questions to the NRC that required additional information from Entergy and Spectra in order to answer. Based on discussions with the NRC staff it is Entergy Nuclear Operations, Inc. (Entergy) understanding that the questions were as follows:

- 1) Whether the existing pipeline facilities near Indian Point (the 26-inch and 30-inch natural gas pipelines) have been inspected and Entergy provided with the results of that inspection; and, if so, what are those results?
- 2) What are Algonquin's plans for the existing gas pipelines once the new 42-inch pipeline is put into service; and, if those existing facilities will be idled, will the idled pipelines still be pressurized with gas?

The purpose of this letter is to provide information related to these questions for NRC's use in responding to these questions. Entergy's knowledge and understanding of these issues is derived largely from its participation in the FERC proceeding for the AIM Project, related communications with Spectra to evaluate any potential impacts of that

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Project on Indian Point, and its understanding of the U.S. Department of Transportation regulations codified at 49 C.F.R. Part 192, Transportation of Natural Gas and Other Gas by Pipeline: Minimum Federal Safety Standards.

Response to Question 1

Spectra implements standard operating procedures ("SOP") requiring: (a) periodic inspection of its pipelines using in-line inspection tools able to identify potential corrosion and damage defects, (b) monitoring of corrosion protection systems, and (c) frequent aerial patrols to identify unauthorized activities on the right-of-way. As the Algonquin Indian Point right-of-way containing the 26-inch and 30-inch natural gas lines is located in a defined high consequence area ("HCA"), as interpreted and classified by Spectra, the PHMSA regulations require inspections of pipelines located in HCA's on a more frequent basis, with a maximum interval of seven years for the internal inspections.

Algonquin has advised Entergy that, consistent with those regulations, Algonquin most recently conducted in-line tool inspections of the existing 26-inch and 30-inch lines in 2011 and 2014, respectively. Algonquin further advised Entergy that all inspections and follow-up actions were completed in accordance with applicable regulations and its own engineering standards. Pursuant to regulations in 49 C.F.R. Part 192, Spectra is required to maintain pipeline records for the useful life of the pipeline. Such records are also subject to inspection and examination by PHMSA, pursuant to 49 C.F.R. Part 190.

Entergy has not been provided with the written results of the inspections nor is Entergy aware of any follow-up actions required to be completed by Algonquin as a result of the in-line inspections. The subject inspections and any follow-up activities are not required to be nor are typically provided to Entergy.

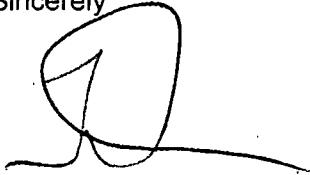
Response to Question 2

Regarding Spectra's current plans for the existing gas pipelines, it is Entergy's understanding that during normal operations the 30-inch pipeline will remain in service as it presently exists with a Maximum Allowable Operating Pressure ("MAOP") of 765 psia. It is also Entergy's understanding that the 26-inch line, from a new valve site and pig trap on the west side of the Hudson River to a new valve site and pig trap on the east side of the Hudson, will be pressurized with gas up to an MAOP of 689 psia. Although the 26-inch line will remain available for service, it will normally be isolated and thus has been referred to as "idled" in our 10 CFR 50.59 safety evaluation. Inspections of both the 26-inch and 30-inch lines will continue in accordance with the applicable regulations and requirements.

There are no new commitments in this letter.

If you have any questions, or require additional information, please contact Mr. Robert Walpole, Manager, Regulatory Assurance, at (914) 254-6710.

Sincerely

A handwritten signature in black ink, appearing to be 'RW', with a long horizontal line extending to the right.

FRD/sp

cc: Mr. Douglas V. Pickett, Senior Project Manager, NRC NRR DORL
Mr. Daniel H. Dorman, Regional Administrator, NRC Region 1
NRC Resident Inspectors Office
Mr. John B. Rhodes, President and CEO, NYSERDA
Ms. Bridget Frymire, New York State Public Service Commission